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May 1, 2025

Hon. Miroslav Lovric  
U.S. Magistrate Judge  
Federal Building and U.S. Courthouse  
15 Henry Street  
Binghamton, NY 13901

*Re: Brooks v. Farina, et al., 25 CV 68 (N.D.N.Y.)*

Dear Magistrate Judge Lovric,

On April 14, 2025, Defendant Daniel Martuscello filed a motion to dismiss Plaintiff's claims. *See* ECF No. 38. Plaintiff's response to that motion is currently due on May 5, 2025. *Id.*

Pursuant to Federal Rule of Civil Procedure 15(a)(1)(B), Plaintiff plans to respond to Defendant Martuscello's motion to dismiss by amending his complaint. Under Rule 15(a)(1)(B), the amended complaint is due on May 5, 2025.

Plaintiff respectfully requests a 14-day extension of time to file his amended complaint, such that it is due on or before May 19, 2025.

Plaintiff's counsel has conferred with counsel for Defendant Martuscello, who states that he does not object to the relief sought in this letter.

Sincerely,

Elizabeth Mazur